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BY ECF

Government Counsel
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Guerra, et al., S-4 10 Cr. 147 (SLT)

Dear Government Counsel:

In addition to the material missing on cooperator Steven Marcus, we are missing at least the following material on cooperating witnesses Kenneth Geller and Reynold Maragni:

Geller:

- (1) It appears from the sentencing transcript that Geller submitted a letter to the Court requesting leniency in sentencing. Please provide a copy of that letter as well as his victims' letters.
- (2) Also, please confirm that you have produced all recordings that Geller made, as the copies we received were not properly numbered, so we are unable to discern exactly what is missing.

Maragni:

- (1) Government's submission to Judge Matsumoto appealing Judge Bloom's grant of bail.
- (2) 3-4-12 Transcript of Maragni's bail proceeding.
- (3) 3-29-12 Transcript of Proceeding before Judge Matsumoto.
- (4) There are two letters from the government dated December 7 and December 9, 2011 requesting modification of Maragni's bail. It appears that the second letter is more detailed because the judge requests more information regarding the government's proposed release conditions for Maragni. Please provide the order or transcript of proceeding at which the judge makes such a request, if any.

Very truly yours,

/s/

Sarita Kedia

Paul Shechtman

Attorneys for Michael Persico